

USAO#2024R00186/VV

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Honorable Leda Dunn Wettre
:
v. : Magistrate. No. 24-13116
:
ANDREW TAKHISTOV : **CRIMINAL COMPLAINT**

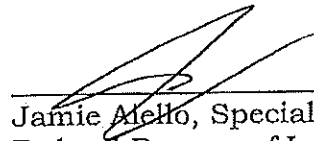
I, Jamie Aiello, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:


SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Jamie Aiello, Special Agent
Federal Bureau of Investigation

Special Agent Aiello attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 9th day of July, 2024.



Honorable Leda Dunn Wettre
United States Magistrate Judge

ATTACHMENT A

From in or around May 2024 through in or around July 2024, in the District of New Jersey and elsewhere, the defendant,

ANDREW TAKHISTOV,

with the intent that another person engage in conduct constituting a felony that has as an element the use and threatened use of physical force against the property of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade another person to engage in such conduct, to wit: destruction of an energy facility, contrary to Title 18, United States Code, Section 1366.

In violation of Title 18, United States Code, Section 373.

ATTACHMENT B

I, Jamie Aiello, am a Special Agent of the Federal Bureau of Investigation ("FBI"). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including audio and video surveillance, social media communications, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Defendant ANDREW TAKHISTOV ("TAKHISTOV") has utilized, and continues to use, a cloud-based instant messaging platform (the "Messaging Platform")¹ to communicate on racially/ethnically motivated ("RMVE")-aligned channels.

2. Based on law enforcement's investigation, between in or around January 2023 and in or around June 2023, TAKHISTOV frequently requested advice from others on the Messaging Platform on how to best configure body armor vests in order to carry the maximum amount of ammunition for an M1-style .308 caliber rifle that he claimed to own. In or around June 2023, TAKHISTOV disseminated manuals on how to construct homemade handguns, sub-machine guns, and shotguns. TAKHISTOV stated, "I have most of the critical components already acquired" (referencing a homemade firearm).

3. TAKHISTOV also expressed interest in traveling overseas to engage in paramilitary-style training and encouraged others to do the same. Specifically, in or around June 2023, TAKHISTOV stated, "we need to arm up and train" and "people keep saying the time isn't right we'll fight later. There's a f***** genocide against us when is the better time to fight?" TAKHISTOV later stated, "I have a good friend who went to South Africa to arm [up] and train. Once I secure finances for the trip, I intend to do the same."

4. In or around September 2023, in a series of posts, TAKHISTOV repeatedly stated "TND [Total N***** Death]," which was a call to violence against Black people commonly used by RMVEs. During that same time,

¹ Unless otherwise stated, all communication described in this Complaint occurred over the Messaging Platform.

TAKHISTOV shared a quote attributable to Adolf Hitler: "Terrorism is the best political weapon for nothing drives people harder than a fear of sudden death." In another September 2023 online post, TAKHISTOV praised Brenton Tarrant, who killed 51 people in a 2019 RMVE-motivated attack in Christchurch, New Zealand, referring to him as a "saint."²

5. In or around January 2024, TAKHISTOV began communicating with a law enforcement employee acting in an undercover capacity ("UCE") over the Messaging Platform. During those communications, which were both online and in person, TAKHISTOV repeatedly referred to his RMVE ideology and his desire to advance that ideology through violent means. In addition to other ideological statements, TAKHISTOV repeatedly referred to Tarrant and other RMVE-motivated attackers including Robert Bowers³ and Anders Breivik.⁴

6. In or around January 2024, the UCE learned from the Messaging Platform that TAKHISTOV formed his own RMVE group called White Legion in North Carolina. TAKHISTOV claimed that he trained with two individuals he recruited from militant neo-Nazi chatrooms. Further, TAKHISTOV stated "Kill ziggers. Behead ziggers."⁵ These comments were made in the overtly neo-Nazi discussion group "European American Unity." During that time, TAKHISTOV also requested and received audio and PDF files of neo-Nazi literature.

7. On or about March 2, 2024, the UCE and TAKHISTOV took part in a white nationalist protest at a park in New Brunswick, New Jersey. During the protest, TAKHISTOV put on a black shirt and black mask and asked the UCE to attach a flag with a Totenkopf⁶ skull and an SS to a stick that TAKHISTOV

² The term "saint" is frequently used by white supremacist extremists to refer to attackers who commit mass shootings and die in the process.

³ Bowers killed 11 people at the Tree of Life synagogue in Pittsburgh, Pennsylvania in 2018 – the deadliest attack on any Jewish community in the United States.

⁴ Breivik killed 77 people in a mass casualty firearm and bombing attack in Oslo, Norway in 2011. Breivik killed 8 people by detonating a van bomb and then, in a mass shooting, killed 69 participants of a political youth summer camp. TAKHISTOV told the UCE that he had read all of Breivik's writings and would regularly watch a Netflix documentary on Breivik's attack for enjoyment, as the first half of the film was a recreation of the actual shooting.

⁵ "Zigger" is a blend of the Russian letter Z and n*gger.

⁶ Totenkopf" is German for "death's head" or skull and typically refers to a skull-and-crossbones image. During the Nazi era, Hitler's Schutzstaffel (SS) adopted one particular Totenkopf image as a symbol. <https://www.adl.org/resources/hate-symbol/Totenkopf>

had converted into a flagpole. TAKHISTOV then publicly displayed the flag. At the conclusion of the protest, TAKHISTOV told the UCE that he would like to meet in person to discuss future actions.

8. On or about March 28, 2024, the UCE met with TAKHISTOV and others to check out two locations for another rally to be held in April. TAKHISTOV stated that he was planning to rally outside the home of an individual he believed was an Antifa member,⁷ and that he planned to light road flares and fly swastika flags to scare that person. TAKHISTOV stated that he also wanted to protest a university Jewish community center but the parties decided to conduct that protest at a later date.

9. On or about April 13, 2024, TAKHISTOV posted the following on the Messaging Platform, "May Archangel Micheal, Wotan, and Allah guide the rockets unto the densest parts of Israel. I don't want war targets; I want mass civilian targets."

10. On or about May 30, 2024, the UCE met TAKHISTOV at a location in New Jersey. During the meeting, which was lawfully recorded, TAKHISTOV told the UCE that he had purchased a plane ticket and was planning on joining the Russian Volunteer Corps ("RVC") on July 10, 2024. TAKHISTOV stated that he chose the RVC because the group was openly National Socialist and, more importantly, specialized in assassinations, attacks on power grids, and other infrastructure sabotage. TAKHISTOV told the UCE that the Nationalist Socialist movement had been doing public protests since the beginning of the Ku Klux Klan and that the country had only gotten worse. TAKHISTOV stated that the death of George Floyd was the best thing to happen to the movement because it caused more white people to wake up; however, standing on a street corner with a sign was not making a difference. TAKHISTOV explained that the type of activism that caused the biggest impact was done by lone actors such as Tarrant.

11. TAKHISTOV explained that once he joined the RVC, there would be an initial one-month long training, after which he would then go to the front lines to fight against the Russian government. TAKHISTOV stated that he would fight with RVC for a period of time and then bring that experience back to America when the country would hopefully be ready for this type of activism.

12. On or about June 13, 2024, TAKHISTOV and the UCE met at a location in New Jersey. During that meeting, which was lawfully recorded, TAKHISTOV explained a three-step plan for white domination as follows: the

⁷ Antifa is a political protest movement comprised of autonomous groups affiliated by their militant opposition to fascism and other forms of extreme right-wing ideology.

first step was to end the war in Ukraine; the next step was to invade Russia; and the final step was to start political activism in Europe and America, supporting National Socialist political parties. TAKHISTOV explained that rallies and protests would not work; rather, people were waiting for a big event, such as the Oklahoma City bombing.⁸ TAKHISTOV stated that he wanted 1,000 Breivik and Tarrant-style attacks to happen at the same time to wake up the masses.

13. TAKHISTOV then began to discuss infrastructure sabotage, and specifically how easy it was to damage an electrical substation using a rock wrapped in copper wire. TAKHISTOV stated that there was a pedestrian bridge near a university that was over an electrical substation that was an easy target. When the UCE commented that it would be difficult to throw rocks perfectly to strike the electrical substation, TAKHISTOV stated they could use Mylar balloons instead, explaining that they could tie a rock to a Mylar balloon, throw it off the pedestrian bridge, and watch it float down onto the power lines.⁹

14. TAKHISTOV then talked about a North Carolina substation attack, in which a man had driven to three different substations and shot at the locations causing power to be shut down in the county. TAKHISTOV stated that the individual had only been apprehended because his wife had Googled the locations of the substations a week before the attack. TAKHISTOV stated that whenever he drove past a substation, he wrote down the address in his notebook so that he would not have to use the Internet. TAKHISTOV tried to find this notebook in his backpack to show the UCE, but could not find it. TAKHISTOV then told the UCE that he (TAKHISTOV) would send the UCE PDFs related to the information they had discussed, stating that if the FBI ever got onto his Messaging Platform account, they would be able to stop multiple terrorist attacks planned to be carried out in Russia because he (TAKHISTOV) was in a Russian National Socialist discussion group. TAKHISTOV stated that members in the discussion group would ask for advice about an attack they were thinking about carrying out, and other members would provide advice on how to carry out such an attack. TAKHISTOV stated that members would then

⁸ On April 19, 1995, Timothy McVeigh and Terry Nichols ignited a truck bomb outside of a federal building in Oklahoma City, Oklahoma, killing 168 people and injuring 680 people. It remains the deadliest act of domestic terrorism in United States history.

⁹ The FBI has confirmed with experts that most Mylar balloons have a metallic foil coating that conducts electricity, creating the possibility of outages on power lines and other dangers.

share news articles about their attacks, along with videos of themselves attacking individuals and infrastructure.

15. The UCE asked TAKHISTOV what the UCE should do while TAKHISTOV was in Ukraine. TAKHISTOV responded that the UCE needed to carry out at least one event of serious activism and send TAKHISTOV the news article of the event. The UCE stated that he would try and, while he might not kill anyone, he would at the very least cause serious injury. TAKHISTOV responded, stating that he would accept the UCE sabotaging an electrical substation.

16. On or about June 16, 2024, the UCE was added to a discussion group on the Messaging Platform entitled, "Defend Europe: Sources" which contained over 400 PDF files. There were only two members in this discussion group, with the UCE being one of the members. In this group, TAKHISTOV sent the UCE a PDF of "The Mujahideen¹⁰ Explosives Handbook," which documented numerous ways to make explosives using chemicals, along with a PDF file of the "Anarchy Cookbook version 2000," which included multiple different instructions on how to make explosives. Other titles in this discussion group included "Homemade break-barrel Shotgun Construction Plans," "BUILD-A-BORZ Home Workshop Machine Pistol," and the "The FSB Badger Gun."

17. TAKHISTOV stated to the UCE, "I just uploaded literally I had on my hard drive (if feds ever find my hard drive, I am f***** cooked)...I should get more." TAKHISTOV then added, "this is really the only thing you need (its sending). It has ideology, it has how to guides, it has ideas for funny things, it goes into how you should plan it, it goes into the thought process." TAKHISTOV then sent a PDF file of "The Hard Reset."

18. I am aware that "The Hard Reset" is a publication that has been circulated by a group known as the Terrorgram Collective. In a subsequent post on the Messaging Platform, TAKHISTOV claimed to have taken a role in the publication of the work and described it as "the perfect starting guide." Among other things, "The Hard Reset" includes:

- a. Ideological justifications for white supremacist accelerationism;
- b. Detailed information on how to make homemade weapons, including chemical weapons, 3D-printed guns, bombs and Molotov cocktails, including step-by-step instructions on

¹⁰ In its broadest sense, Muslims who fight on behalf of the faith or the Muslim community.

how to make a Molotov cocktail (fill a bottle with a flammable liquid, insert a rag inside the bottle, seal the bottle, and then throw the bottle), as well as recommendations on which types of bottles to use and tips for throwing the bottle to cause maximum damage without placing the actor in danger;

- c. Ideological justifications for white supremacist accelerationism;
- d. Detailed information on how to attack a substation, including the use of Mylar balloons;
- e. Lists of targets to attack, including members of racial, religious, and LGBTQ+ groups, specific individuals deemed "high-value targets," and critical government infrastructure;
- f. Tactical recommendations on how to plan and carry out an attack, including how to create and operate a domestic terror cell, how to select a target, how to effectively plan and prepare the attack, and how not to get caught; and
- g. Propaganda intended to radicalize young and impressionable racists and incite them to act.

19. On or about June 18, 2024, the UCE and TAKHISTOV exchanged messages on the Messaging Platform. TAKHISTOV shared a photograph of a diagram with the title, "Sabotage to Electrical Failure to Production Shortage to Financial Loss to Socio-Economic Crisis to Total Chaos to Accession to Power." TAKHISTOV stated, "We have to make sure that in the acts of sabotage, it's always the system at fault because if it's too blatantly obvious its NS [National Socialist], that will just demonize the NS from public society."

20. On or about June 28, 2024, TAKHISTOV, the UCE, and another individual (Individual-1) met in New Jersey. During that meeting, TAKHISTOV confirmed that TAKHISTOV and Individual-1 were planning to travel to fight for the RVC in Ukraine, and that they were leaving the United States on July 10, 2024.

21. Also during that meeting, TAKHISTOV, Individual-1, and the UCE discussed a possible attack on the power grid. The group at first discussed throwing rocks wrapped in copper wiring at powerlines, but then concluded that plan was not feasible. TAKHISTOV and the UCE then drove to a park in New Brunswick, New Jersey and walked to a pedestrian bridge that overlooked a circuit breaker station (the "New Brunswick Facility") owned and operated by Public Service Enterprise Group ("PSE&G").

22. TAKHISTOV recognized that the New Brunswick Facility utilized underground power lines. After some discussion of the different options, TAKHISTOV gave the UCE detailed instructions as to how to access the roof of the New Brunswick Facility. From the top of the building, TAKHISTOV further instructed, the UCE should throw multiple Molotov cocktails down onto the New Brunswick Facility and then jump off the building to escape.

23. TAKHISTOV gave the UCE numerous specific instructions on, among other things: Molotov cocktail construction; Google searches; type of clothing to wear during an attack to avoid suspicion; surveillance camera locations; parking locations to evade surveillance cameras; and strategic attack timing.

24. TAKHISTOV further told the UCE he should apply for a gun license because it would provide opportunities for many different attacks. TAKHISTOV recommended a .22 long rifle due to the quieter sound. TAKHISTOV instructed the UCE to buy the cheapest possible cell phone, go to a cell tower with the rifle, and shoot at the cell tower signal dishes until the cell phone lost service. TAKHISTOV stated that cellular services released maps showing the general locations of the cell towers that the UCE would be able to use, in conjunction with Google Maps Street View, to locate the exact locations of cell towers to shoot down.

25. On or about June 30, 2024, TAKHISTOV uploaded approximately 50 files and videos to the same "Defend Europe: Sources" Telegram channel described above in paragraph 16. The files and videos appeared to be mostly in Russian and/or Ukrainian and appeared to consist of Nazi Germany history, explosive manuals, homemade guides on how to build explosives from easily obtained items, and guides on how to manufacture a firearm, including how to use basic milling and handheld tools to convert metal pipes into firearms.

26. On or about July 1, 2024, TAKHISTOV and the UCE exchanged messages about various ethnic cleansing campaigns. TAKHISTOV compared the ethnic cleansing campaigns carried out in Yugoslavia, Kosovo, and by the Roman Empire and concluded that a combination of the Yugoslavian and Roman campaigns was the best choice because that choice would enable TAKHISTOV and the UCE to depopulate the cities, move people to rural areas, and kill those deemed to be undesirable. TAKHISTOV then stated:

to be a formidable force
it'd be cool to have a collection of mortars and rockets
imagine a saint attack where the parking lot of a synagogue gets hit at
the right time
you don't need to many projectiles just 5 or so even if no one dies, the
shock factor of a mortar attack on a synagogue in America

27. On or about July 5, 2024, TAKHISTOV and the UCE met at a location in East Brunswick, New Jersey. TAKHISTOV directed the UCE to drive to a park located in East Brunswick. Once at that location, TAKHISTOV showed the UCE that there was an easily climbable fence in the woods and that there was a warehouse with trucking equipment on the other side of the fence. TAKHISTOV told the UCE that the UCE should throw Molotov cocktails on the trucks and pallets, call in a bomb threat to a nearby warehouse, and then plant a bomb at a different warehouse, thereby causing all the warehouses to be shut down.

28. TAKHISTOV and the UCE then drove to another location in North Brunswick, New Jersey. During the drive, TAKHISTOV confirmed that he and Individual-1 were leaving for Ukraine on Wednesday, July 10 and that he wanted the UCE to drive them to the airport. TAKHISTOV also stated that his ultimate dream was to attack a synagogue with a Hamas-style rocket and that TAKHISTOV wanted the UCE to carry out such an attack. When the UCE stated that the UCE did not have the knowledge to build such a rocket, TAKHISTOV responded that with his (TAKHISTOV's) instruction, the UCE would be able to launch a successful rocket attack within two years. TAKHISTOV repeated that he wanted the UCE to carry out multiple attacks while TAKHISTOV was in Ukraine.

29. Once TAKHISTOV and the UCE arrived at the location in North Brunswick, TAKHISTOV directed the UCE to follow him along a railroad track until they were behind a warehouse. TAKHISTOV showed the UCE an abandoned building and instructed the UCE that it could be used as a hideout or to stash equipment. Nearby was a large truck depot with multiple trailers parked. TAKHISTOV told the UCE that the UCE should download a list of abandoned places in the UCE's area to hide out or stash equipment, instructing that the UCE should look for large, abandoned manufacturing buildings and hotels in order to avoid running into other people.

30. TAKHISTOV then led the UCE further north along the railroad to an electrical substation owned and operated by PSE&G (the "North Brunswick Substation"). TAKHISTOV stated that he had corresponded with an electrician friend in Russia and learned that the New Brunswick Facility was merely a circuit breaker and, therefore, any attack would have only a minimal effect. Instead, TAKHISTOV explained, he and the UCE needed to sabotage the North Brunswick Substation, which was an actual electrical substation. TAKHISTOV instructed the UCE to take a photograph of the North Brunswick Substation and stated that he (TAKHISTOV) would share the photograph with his friend in Russia for advice on how to best sabotage the substation.

31. TAKHISTOV explained that the plan for the North Brunswick Substation would still involve use of Molotov cocktails and that the UCE could

go to any [Automotive Repair Franchise] store and purchase engine fuel for the fuel portion of the cocktail.

32. TAKHISTOV and the UCE then drove to the park near the New Brunswick Facility. The UCE asked TAKHISTOV whether Individual-1 supported the plan to attack the New Brunswick Facility [even though it was a circuit breaker] and TAKHISTOV stated that Individual-1 was aware of this plan and supported it. Once inside the park, TAKHISTOV instructed the UCE to take multiple photographs of the New Brunswick Facility, directing the UCE how and where to focus the cell phone camera and asking the UCE to zoom in on particular parts of the New Brunswick Facility. TAKHISTOV stated that he was going to send the photographs to his friend in Russia for advice on how best to sabotage the New Brunswick Facility.

33. After inspecting the New Brunswick Facility, TAKHISTOV stated that the UCE should aim the Molotov cocktails at the pylons and cylinders believed to be filled with oil since this would cause the greatest damage. TAKHISTOV instructed that the UCE should buy a six-pack of beer bottles, use the bottles for the Molotov cocktails, and use the packaging to transport them since this would be the easiest way to keep them secure. TAKHISTOV stated that the UCE should try to fit as many bottles as possible inside a backpack, instructing the UCE that the UCE would need 10 to 12 Molotov cocktails – one for each cylinder and pylon. TAKHISTOV also told the UCE that the UCE should carry out an attack on the New Brunswick Facility and the North Brunswick Substation on the same night to have the most effect, instructing the UCE that the UCE may need to stash equipment at two locations to successfully carry out the attacks.

34. On the way back to the parking lot, TAKHISTOV and the UCE continued discussing different strategies for terrorist attacks, including rocket and explosives attacks against synagogues.

35. TAKHISTOV told the UCE that the UCE needed to start researching possible targets to attack and instructed the UCE to recruit members to his group to carry out militant attacks. TAKHISTOV instructed the UCE that the UCE could do this by starting a hiking club and then slowly radicalizing people to militant activism.

36. TAKHISTOV asked to use Google Maps on the UCE's phone and showed the UCE the location of another substation along the railroad near Edison, New Jersey (the "Edison Substation"). TAKHISTOV instructed the UCE to plan every attack as if the UCE would be caught, meaning it would be the UCE's last action, and, therefore, always try to cause the most damage in one attack. TAKHISTOV further discussed the possibility of derailing a train on the adjacent tracks by building a wooden ramp and then pouring concrete down the ramp into the train tracks, thereby causing the train to derail.

37. TAKHISTOV stated that if he was able to bring back illegal supplies from Ukraine, he would be able to carry out extremely successful attacks which would threaten the United States government.

38. On or about July 7, 2024, TAKHISTOV forwarded the UCE a message from another individual (Individual-2) using the Messaging Platform that included a photograph of the North Brunswick Substation with a circle around a metal cylinder of the substation and the following caption: "Your target is this n*gger." TAKHISTOV added the following message: "yep you hit that [referring to the oil drum] with like a few molotovs you're good."

39. TAKHISTOV forwarded the UCE another message from Individual-2 which included a photograph of the New Brunswick Facility with a circle around a section of wires inside the substation and the following caption:

I think, here you gotta aim at the cables. Fire will melt the coating and if it gets to the metallic core, it will overheat it and actually an electric arc might occur. In case you see that the coating is really melting, you better back away. Still, you have to understand, that the most important equipment and commuting devices are inside the facility, so yeah, do as much damage as you can.

TAKHISTOV then stated:

great news literally walk along the fence and just throw molotovs at the grounding wires ... depending how good your aim is at minimum, you need 5, 2 for the oil tank at that substation, and then 1 for each of the grounding connections for this.

40. At all times relevant to this complaint, PSE&G was involved in the production, storage, transmission, or distribution of electricity.